

EXHIBIT A

STATE OF MICHIGAN

IN THE 44TH JUDICIAL DISTRICT COURT

NORTHWEST NEUROLOGY PC,
(JOSEPH ARNOLD),

Plaintiff,

v

ALLSTATE INSURANCE COMPANY,

Defendant.

Case No. 20-02553 GC

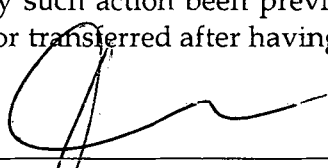
HON.

DEREK W. MEINERCKE

REC'D FOR FILING
44TH JUDICIAL DISTRICT COURT
20 APR 10 AM 11:28

LAW OFFICES OF TODD J. STEARN, P.C.
Todd J. Stearn (P51496)
Attorney for Plaintiff
29829 Greenfield Road, Ste. 101
Southfield MI 48075
(248) 744-5000 / (248) 744-5002 Fax
todd@tjlawfirm.com

There is no other civil action between these parties arising out of the same transaction or occurrence alleged in this Complaint pending in this Court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge.



Todd J. Stearn (P51496)

COMPLAINT

NOW COMES Plaintiff, d/b/a NORTHWEST NEUROLOGY PC CENTER, by and through its attorney, LAW OFFICES OF TODD J. STEARN, P.C., and for its Complaint against the above-named Defendant, states unto this Honorable Court as follows:

JURISDICTION AND VENUE

1. The Plaintiff, NORTHWEST NEUROLOGY PC, is a duly incorporated corporation doing business as, NORTHWEST NEUROLOGY PC CENTER, and located in the City of Warren, County of Macomb and State of Michigan.

2. The Defendant, ALLSTATE MUTUAL AUTOMOBILE INSURANCE COMPANY doing business as ALLSTATE (ALLSTATE), is a duly licensed insurance company in the State of Michigan doing business in the County of Oakland and State of Michigan. The resident agent is: The Corporation Company, 40600 Ann Arbor Rd., E., Ste. 201, Plymouth, MI 48170.

3. The amount in controversy herein does not exceed Ten Thousand Dollars (\$10,000.00), exclusive of costs, interest and attorney's fees.

4. JOSEPH ARNOLD was involved in an automobile crash in which she suffered severe injuries.

5. Plaintiff provided medical services as a result of the crash and, in the process, incurred expenses.

6. At the time of the crash, JOSEPH ARNOLD was covered by an insurance policy issued by Defendant, ALLSTATE, which was in effect under (and in accordance with) the provisions of the Michigan No-Fault Act, and for which the applicable premium was paid.

7. The automobile insurance policy issued by Defendant, ALLSTATE, provided JOSEPH ARNOLD with a right to Personal Injury Protection coverage for No-Fault benefits including, but not limited to, wage loss, medical treatment, replacement services, attendant care, and medical mileage and other reasonable and necessary expenses.

8. Under provisions of Defendant ALLSTATE's automobile insurance policy, JOSEPH ARNOLD made a claim for medical benefits and other benefits available under its policy of insurance, including the amount incurred by Plaintiff.

9. Defendant has refused to pay the requested benefits.

10. Under MCL 500.3112, a medical provider is authorized to bring a direct action to recover unpaid medical expenses for medical treatment and, moreover, can pursue No-Fault penalty sanctions and attorney's fees.

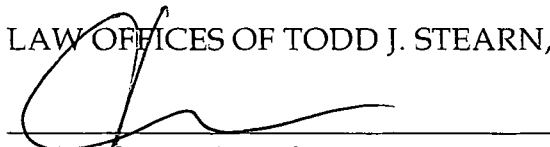
11. Defendant's position is unreasonable and unlawful, thus entitling Plaintiff to recover:

- a. Unpaid medical expenses;
- b. Unpaid medical services;
- c. Penalty interest;
- d. Attorney's fees; and
- e. Such other expenses that become known through the course of litigation.

WHEREFORE, Plaintiff respectfully requests entry of a Judgment against Defendant, ALLSTATE INSURANCE COMPANY, for No-Fault benefits to which it is entitled plus penalty interest, attorney's fees, costs, and such other relief as this Court deems it to be entitled.

Respectfully Submitted:

LAW OFFICES OF TODD J. STEARN, P.C.



Todd J. Stearn (P51496)
Attorney for Plaintiff
29829 Greenfield Rd., Ste. 101
Southfield, MI 48076
(248) 744-5000 / (248) 744-5002 Fax

Dated: July 9, 2020

LAW OFFICES OF TODD J. STEARN, P.C.

2/19/2020

Practice Fusion

MENU

Help

Cicely Fisher Northwest Neurology Labs...

Settings

Log out

Lock

Patient lists Joseph Arnold x



Joseph Arnold

PRN: AJ668925

62 yrs M

Invite to Patient Portal

Actions

Summary

Timeline

Profile



Cancel

Save

Payment information

Insurance Add Print active insurance

PAYMENT PREFERENCE

Primary Insurance

SHOW

Active payers

PAYER	TYPE	INSURANCE ID	EFFECTIVE FROM	EFFECTIVE TO	COPAY
Primary Allstate	Other	0541760823	04/14/2019		

PIP Adjuster: Zachary Shencopp
Billing Dept.

Guarantor

PATIENT RELATIONSHIP TO GUARANTOR

Select relationship...

GUARANTOR NAME

First name

Middle Initial (op...

Last name

ADDRESS

Street address 1

Street address 2

City

State

ZIP

DATE OF BIRTH

SEX

MM/DD/YYYY

Male

Female

Unknown

SSN

###-##-####

PRIMARY PHONE NUMBER

(x) xxx-xxxx

Ext

SECONDARY PHONE NUMBER

(x) xxx-xxxx

Ext

Descriptions

Advertisement



Pinned note



No pinned note for this patient

Notes

Attorney:
Kristen
(248) 554-3440

Processed ECF: 02/04/2020
02/05/2019 Discontinued

Allstate
0541760823

2/19/2020

Practice Fusion

MENU

Help

Cicely Fisher

Northwest Neurology Labs...

Settings

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Patient lists Joseph Arnold x



Joseph Arnold

PRN: AJ668925

62 yrs M

Invite to Patient Portal

...

Actions

Summary

Timeline

Profile



Cancel

Save

Patient information

Add more information

PREFIX

NAME *

SUFFIX

Joseph

Middle (optional)

Arnold

SEX *

DATE OF BIRTH *

Male

Female

Unknown

SOCIAL SECURITY NUMBER

RECORD NUMBER

AJ668925

Generate



Active Patient

Pinned
noteNo pinned
note for this
patient

Notes

Attorney:
Kristen
(248) 554-
3440

Contact information

MOBILE PHONE *

EMAIL *

USA



Patient doesn't have an email address

Patient doesn't have a mobile phone

HOME PHONE

(xxx) xxx-xxxx

WORK PHONE

(xxx) xxx-xxxx

Ext.

ADDRESS

Street address 2

ontiac

MI

48341

PREFERRED METHOD OF COMMUNICATION

Provider did not ask

NOTICE TO PATIENT MESSAGING

Advertisement

INVOICE# 834241384 PAGE:1
ACCOUNT# OF GUARANTOR: 37198692

DATE: Feb-18-2020

NORTHWEST NEUROLOGY CLINIC
27200 LAHSER RD
STE 100
SOUTHFIELD, MI 48034-2137PATIENT ACCOUNT# 37198692
PATIENT: ARNOLD, JOSEPH
DATE OF SERVICE: 12-03-19
PLEASE PAY \$23,100.00

CHECK#

JOSEPH ARNOLD
[REDACTED]PAY TO: NORTHWEST NEUROLOGY CLINIC
27200 LAHSER RD
STE 100
SOUTHFIELD, MI 48034-2137

-----Cut Here & Return Above Portion With Payment-----			
DATE	DESCRIPTION	CHARGES	PAYMENTS/ ADJUSTMENTS BALANCE
PATIENT: ARNOLD, JOSEPH ACCT# 37198692			
	Practice : NORTHWEST NEUROLOGY CLINIC Rendering Provider : JENKINS, TESSY 12-03-19 Continuous intraoperative neurophysiology monitoring in the operating	\$770.00	\$770.00
	Practice : NORTHWEST NEUROLOGY CLINIC Rendering Provider : JENKINS, TESSY 12-03-19 2 limbs with/without paraspinal areas	\$4,400.00	\$4,400.00
	Practice : NORTHWEST NEUROLOGY CLINIC Rendering Provider : JENKINS, TESSY 12-03-19 Upper Somatosensory evoked potential	\$3,300.00	\$3,300.00
	Practice : NORTHWEST NEUROLOGY CLINIC Rendering Provider : JENKINS, TESSY 12-03-19 2 limbs with/without paraspinal areas	\$4,400.00	\$4,400.00
	Practice : NORTHWEST NEUROLOGY CLINIC Rendering Provider : JENKINS, TESSY 12-03-19 Lower Somatosensory evoked potential	\$5,830.00	\$5,830.00
	Practice : NORTHWEST NEUROLOGY CLINIC Rendering Provider : JENKINS, TESSY 12-03-19 2 limbs with/without paraspinal areas	\$4,400.00	\$4,400.00

PLEASE PAY \$23,100.00